

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re: Shannel Mckenzie Peoples-Hilliard, Debtor) Case No. 15-35840-KRH
) Chapter 13

NOTICE OF HEARING AND OBJECTION TO CONFIRMATION

COMES NOW the Chapter 13 Trustee, Suzanne E. Wade, and moves this Court to deny confirmation of the plan dated November 16, 2015, for the cause as follows:

1. The Debtor filed this Chapter 13 Petition, now pending in the United States Bankruptcy Court, Eastern District of Virginia, Richmond Division, on November 12, 2015 under 11 U.S.C. Chapter 13.
2. This Objection is filed pursuant to 11 U.S.C. § 1325.
3. The above-filed Chapter 13 case is not eligible for confirmation due to the Debtor's failure to provide proof of her household's current monthly income. Specifically, the Trustee would request the Debtor provide detailed explanation of her husband's business income and expenses for the six months prior to her bankruptcy filing. The Trustee requests financial records including General ledger and financial statements (income statements and balance sheets) along with bank statements for his business.

WHEREFORE, for the reasons stated herein, the Chapter 13 Trustee respectfully moves the Court to deny confirmation of the Debtor's proposed Chapter 13 Plan, and for such further and other relief as the Court deems necessary.

Suzanne E. Wade, Chapter 13 Trustee
Virginia State Bar Number 31868
1313 East Main Street, Suite A
Post Office Box 1780
Richmond, Virginia 23218-1780
(804) 775-0979

Notice is hereby given, pursuant to Local Rule 3015(E)(2), that a hearing on this motion will be held at United States Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, Virginia, 23219, on February 3, 2016 at 11:10 A.M.

Date: January 19, 2016

/s/ Suzanne E. Wade
Chapter 13 Trustee

CERTIFICATE OF SERVICE

I hereby certify a true copy of the foregoing NOTICE OF HEARING AND OBJECTION TO CONFIRMATION was served by first-class mail, postage prepaid, this 19th day of January, 2016, upon the Debtor, Shannel Mckenzie Peoples-Hilliard, at 3919 Moss Side Avenue, Richmond, Virginia 23222. Debtor's counsel, Christina P. Spratley, Esquire, was served by electronic notification to ecf@bolemanlaw.com.

/s/ Suzanne E. Wade
Chapter 13 Trustee

UNITED STATES BANKRUPTCY COURT
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In re: Shannel Mckenzie Peoples-Hilliard, Debtor)	Case No. 15-35840-KRH
)	Chapter 13
3919 Moss Side Avenue)	
Richmond, VA 23222)	
)	
XXX-XX-6078)	

NOTICE OF OBJECTION TO CONFIRMATION

Suzanne E. Wade, Chapter 13 Trustee, has filed papers with the Court objecting to the confirmation of your Chapter 13 Plan dated November 16, 2015.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to grant the relief sought in the Objection, or if you want the Court to consider your views on the Objection, then on or before three (3) days before the date of the hearing, you or your attorney must:

File with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response to the Court for filing, you must mail it early enough that the Court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, Virginia 23219

You must also mail a copy to:

Suzanne E. Wade, Chapter 13 Trustee
Post Office Box 1780
Richmond, Virginia 23218-1780

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Objection, and may enter an order granting that relief.

Date: January 19, 2016

/s/ Suzanne E. Wade
Chapter 13 Trustee

Suzanne E. Wade, Chapter 13 Trustee
Virginia State Bar Number 31868
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/s/ Suzanne E. Wade
Chapter 13 Trustee